

STATE OF COLORADO

COLORADO DEPARTMENT OF HEALTH

Dedicated to protecting and improving the health and environment of the people of Colorado

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Roy Romer
Governor

Patricia A. Nolan, MD, MPH
Executive Director

June 17, 1994

Mr. Richard J. Schassburger
U.S. Department of Energy
Rocky Flats Plant, Building 116
P. O. Box 928
Golden, Colorado 80402-0928

RE: Draft Technical Memorandum No. 2, OU-2 Subsurface IM/IRA,
Soil Vapor Extraction Pilot Test Off Gas Treatment Alternatives Evaluation

Dear Mr. Schassburger,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (CDH) has reviewed the above referenced document. This document was also reviewed by the Air Pollution Control Division (APCD). The Division concurs with the selection of thermal oxidation as SVE pilot unit off gas treatment for removal of VOCs from extracted soil gas.

The Division has determined that the off gas treatment system will not be treating a hazardous waste and therefore, is not subject to the requirements of 6 CCR 1007-3 Part 264, Subpart O incinerator standards or Subpart X miscellaneous treatment units.

The Division considers the proposed off gas treatment unit to be an pollution control devise and will require the final system design to meet all applicable air pollution reporting and permitting requirements. The Division and the APCD must review the final system design to determine whether or not Air Pollution Emission Notifications or emissions permits may be required.

If you have any questions, please contact Jeff Swanson of my staff at 692-3416.

Sincerely,

Gary W. Baughman, Chief
Facilities Section
Hazardous Waste Control Program

cc: Martin Eastmark, EPA
Eric Dille, DOE
Michael Klein, EG&G
Dick Fox, CDH-APCD
Archie Crouse, CDH-APCD
Steve Tarlton, CDH-OS
Dan Miller, AGO